



**MITSUBISHI HEAVY INDUSTRIES, LTD.**

16-5, KONAN 2-CHOME, MINATO-KU  
TOKYO, JAPAN

December 31, 2007

Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Attention: Mr. R. William Borchardt  
Director, Office of New Reactors

Project No.0751  
MHI Ref: UAP-HF-07188

**Subject: Probabilistic Risk Assessment Report for the US-APWR**

Mitsubishi Heavy Industries, Ltd. ("MHI") is providing the U.S. Nuclear Regulatory Commission ("NRC"), for its information, with a copy of the report entitled "US-APWR Probabilistic Risk Assessment, MUAP-07030 ("PRA"). This report is not part of MHI's US-APWR Design Certification Application ("Application"). As required by 10 C.F.R. § 52.47(a)(27), however, a description of the PRA and a summary of its results are included in Chapter 19 of the "Design Control Document for the US-APWR" ("DCD"), which is being submitted concurrently herewith as part of the Application. The PRA is being submitted electronically in digital versatile disk (DVD).

The enclosed PRA includes both information that MHI considers proprietary and sensitive unclassified non-safeguards information, generally referred to as security-related information (SRI), which is not to be publicly disclosed under the Commission guidance. Therefore, the report should be withheld from disclosure pursuant to 10 C.F.R. § 2.390. In accordance with the NRC submittal procedures, this letter includes an Affidavit that identifies the reasons why the report should be withheld from disclosure pursuant to 10 C.F.R. § 2.390 (a)(4) and 10 C.F.R. § 9.17(a)(4) in order to protect MHI proprietary information.

Please contact Dr. C. Keith Paulson, Senior Technical Manager, Mitsubishi Nuclear Energy Systems, Inc. if the NRC has questions concerning any aspect of this submittal. His contact information is provided below.

Sincerely,

*M. Kaneda*  
Masahiko Kaneda  
General Manager- APWR Promoting Department  
Mitsubishi Heavy Industries, Ltd.

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HRO

Enclosures:

1. Affidavit of Masahiko Kaneda
2. CD 1: "US-APWR Probabilistic Risk Assessment (MUAP-07030)"  
– Non public (Containing proprietary and sensitive unclassified non-safeguards information)

The files contained in each CD are listed in Attachment 1.

CC: S. M. Coffin  
S. R. Monarque  
J. A. Ciocco  
J. W. Chung  
D. B. Matthews  
C. K. Paulson

Contact Information

C. Keith Paulson, Senior Technical Manager  
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**ENCLOSURE 1**

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

In the Matter of )  
MITSUBISHI HEAVY INDUSTRIES, LTD. )  
US-APWR )  
Standard Plant Design Certification Application )  
)

AFFIDAVIT OF MASAHIKO KANEDA

I, Masahiko Kaneda, being duly sworn according to law, depose and state as follows:

1. I am General Manager, APWR Promoting Department, of Mitsubishi Heavy Industries, Ltd ("MHI"), and have been delegated the function of reviewing MHI's US-APWR documentation to determine whether it contains information that should be withheld from disclosure pursuant to 10 C.F.R. § 2.390 (a)(4) and 10 CFR § 9.17(a)(4) as trade secrets and commercial or financial information which is privileged or confidential.
2. In accordance with my responsibilities, I have reviewed the enclosed "US-APWR Probabilistic Risk Assessment, MUAP-07030" and have determined that portions of the report contain MHI proprietary information that should be withheld from public disclosure.
3. The MHI proprietary information in the "US-APWR Probabilistic Risk Assessment, MUAP-07030" has in the past been, and will continue to be, held in confidence by MHI and its disclosure outside the company is limited to regulatory bodies, customers and potential customers, and their agents, suppliers, and licensees, and others with a legitimate need for the information, and is always subject to suitable measures to protect it from unauthorized use or disclosure.
4. The basis for holding the referenced information confidential is that it describes the unique design and methodology developed by MHI for performing the design of the US-APWR reactor. That methodology was developed at significant cost to MHI, since it required the performance of detailed design calculations, analyses, and testing extending over several years. The referenced information is not available in public sources and could not be gathered readily from other publicly available information. MHI knows of no way the information could be lawfully acquired by organizations or individuals outside of MHI.
5. The referenced information is being furnished to the Nuclear Regulatory Commission ("NRC") in confidence and solely for the Commission's information.
6. Public disclosure of the referenced information would assist competitors of MHI in their design of new nuclear power plants without the costs or risks associated with the design of new systems and components. Disclosure of the information identified as proprietary would therefore have negative impacts on the competitive position of MHI in the U.S. nuclear plant market.

I declare under penalty of perjury that the foregoing affidavit and the matters stated therein are true and correct to the best of my knowledge, information and belief.

Executed on this 31<sup>st</sup> day of December, 2007.

A handwritten signature in cursive script, appearing to read "M. Kaneda".

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Masahiko Kaneda